

# Conducting Green Procurement Audits

## Environment, Energy Security, and Sustainability

### Conference and Exposition

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## OUTLINE

PURPOSE: To provide an overview of conducting reviews of facility Green Procurement programs.

- ✓ Why do a Green Procurement Audit?
- ✓ Preparing for the Audit
- ✓ Conducting the Onsite Audit
- ✓ Developing Audit Conclusions and Recommendations

## Why a GP Audit?

- Enhance implementation
- Measure GP performance
- Focus on ways to improve
- Other Drivers –
  - The facility's Environmental Management System (EMS)
  - Compliance inspections (TEAM Guide)
  - Regulatory agency inspections



# Preparations

- Know your objectives and desired outcome
- Establish audit criteria
- Establish audit scope
- Become familiar with the facility's procurement procedures
- Determine the facility's GP implementation status and progress
- Tailor the audit based on the facility's size, mission, complexity



## GP Audit Criteria

- Federal Acquisition Regulations (FAR Part 23)
- Executive Order 13514 – Sustainable Procurement
- Federal Procurement Preference Programs
  - Comprehensive Procurement Guidelines (CPGs) – Recycled-content (USEPA)
  - BioPreferred Program – Biobased (USDA)
  - Energy Star – Energy Efficient (USEPA)
- DOD GP policy and strategy
  - Component-specific requirements
- Facility EMS targets and objectives

# Preparations

- Scheduling
  - Contact facility GP program coordinator to set up schedule
  - Schedule appointments in advance with key personnel
  - On site, fill in time with spot-checks of functional areas, janitorial closets, storage cabinets, supply rooms, retail stores



Auditing Tip:  
Schedule with  
your busiest  
contacts first

# Preparations



- Arrange kick-off meeting with key players
- Ask for documentation in advance (contracts, purchasing records)
- Compile information to take with you
  - Regulations and requirements
  - Fact Sheets
  - Product information
  - Sample plans and forms



## Conducting the Audit

- Allow enough time for each site visit (30-60 minutes)
- Be flexible with appointments
- Allow time to look at records
- Plan questions ahead of time
- Address program elements:
  - Plans, procedures
  - Successes and obstacles
  - Training availability and effectiveness
  - Measurement of performance indicators



## Conducting the Audit

- Key Personnel
  - Contracting staff
  - Contractors
  - Purchase card program manager
  - Purchase card trainer(s)
  - Purchase card approving officials
  - EMS manager
  - Energy manager
  - Environmental staff
- Site Visits
  - Public Works/Engineering
  - Logistics
  - Supply Store
  - Dining Facility
  - Maintenance
  - Medical
  - Information Technology
  - Hazmart/Pharmacy

# Conducting the Audit

- Personnel Associated with Contracted Activities (Requirements Generators, Engineers, and Procurement Staff)
  - Construction
  - Renovation
  - Maintenance
  - Janitorial
  - Grounds keeping
  - Dining
  - Recreation



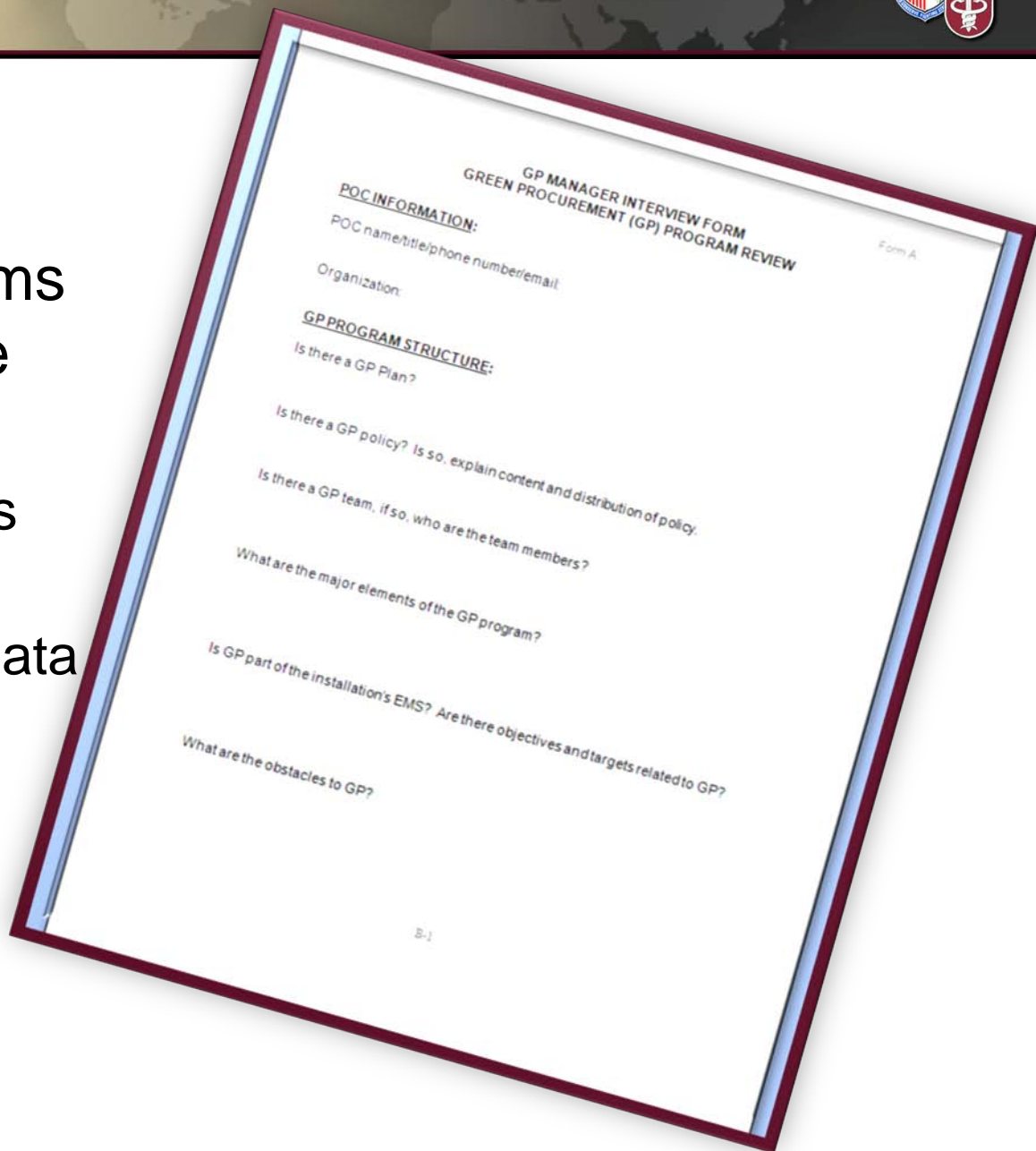
# Conducting the Audit

- Records to Review
  - Facility GP policy
  - GP training records
  - GP Implementation plan
  - Contracts: general contract language and preferences for green products
  - Contracts: FAR provisions and clauses
  - Federal Procurement Data System (FPDS)
  - Credit Card receipts and inspection records
  - Documented exceptions to mandatory preference products (CPG and BioPreferred items)
  - Contractor submittals



## Create Forms

- Use standardized forms for interviews and site visits
  - Cover multiple topics for one visit
  - Provide consistent data
  - Help trigger your memory to ask questions



GP MANAGER INTERVIEW FORM  
GREEN PROCUREMENT (GP) PROGRAM REVIEW

Form A


POC INFORMATION:  
POC name/title/phone number/email  
Organization:

GP PROGRAM STRUCTURE:  
Is there a GP Plan?  
Is there a GP policy? If so, explain content and distribution of policy.  
Is there a GP team, if so, who are the team members?  
What are the major elements of the GP program?  
Is GP part of the installation's EMS? Are there objectives and targets related to GP?  
What are the obstacles to GP?

B-1

## Key Questions

- How are items procured?
- How are contract requirements defined?
- What is the procurement review process?
- What monitoring/checking is already in place?
- How are GP requirements incorporated into training?
- How is the GP policy communicated?



Auditing Tip:  
Obtain copies  
of internal  
checklists

## Developing Your Findings

- Address the *overall* compliance status for mandatory preference programs
- Address individual elements of the GP program and make recommendations
  - Policy
  - Training
  - Processes and procedures
  - Review system
  - Measurement
  - Checking and Corrective Action



Auditing Tip:  
Cite regulatory  
or policy  
references for  
each finding



## Your Conclusions

- The audit should answer the question: *does the facility have a program in place to identify green opportunities in the procurement process and ensure that preferences for green products are stated, considered, and provided?*
- Does the facility have measurable goals? If not, suggest some.
- How well are they meeting those goals?





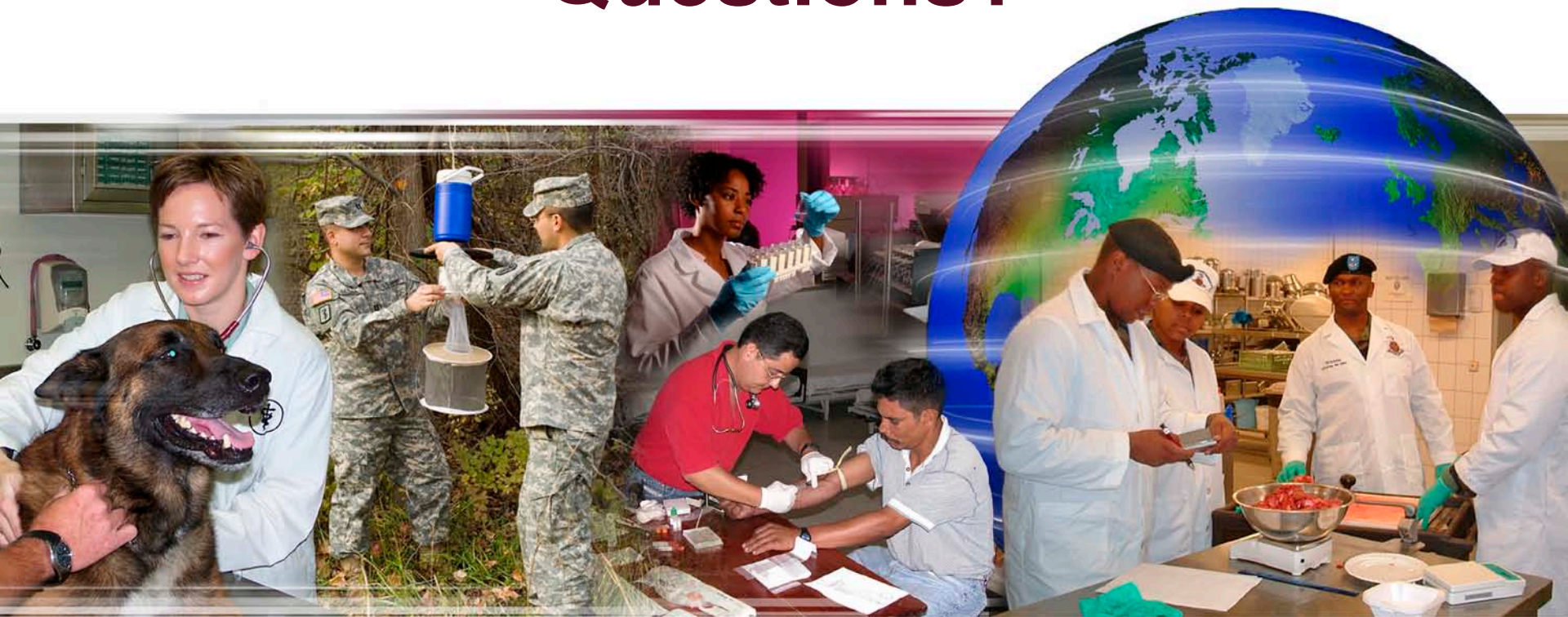
## Examples of Green Procurement Goals/Targets

- Increase in the number of contracts meeting requirements for recycled-content products (FAR provisions and clauses) in the Contract Action Report\*
- Increase in the purchases of Federally-defined indicator items (applies to purchase card, MILSTRIP purchases)\*
- Increase in the percentage of contracting personnel trained in Green Procurement\*
- Increase number of green items offered in the office supply store
- Ensure 95% of new IT purchases (computers and monitors) meet EPEAT standards



\*These are DOD metrics

# Questions?



**U.S. ARMY MEDICAL DEPARTMENT**

**United States Army Public Health Command (Provisional)**